510(k) Summary of Safety and Effectiveness

Submitter:

Alliance Medical Corporation

10232 South 51st Street Phoenix, Arizona 85044

Contact:

Don Selvey

Vice President, Regulatory Affairs and Quality Assurance

(480) 763-5300

Date of preparation:

8 August 2001

Name of device:

Reprocessed External Fixation Devices

Common Name:

External Fixation Devices, Fixation Appliance, Single/Multiple

Component and Invasive Traction Component

Classification Name:

Single/Multiple Component Metallic Bone Fixation Appliances and

Accessories

Reprocessed device(s):

MANUFACTURER	MODEL NUMBER	DESCRIPTION
SYNTHES (USA)	392.88	NUT FOR 8.0MM THREADED RODS
SYNTHES (USA)	393.36	TUBE-TO-TUBE CLAMP
SYNTHES (USA)	393.361	TITANIUM ROD-TO-ROD CLAMP
SYNTHES (USA)	393.436	RING-TO-ROD CLAMP
SYNTHES (USA)	393.44	EXTERNAL FIXATION CLAMP
SYNTHES (USA)	393.45	EXTERNIAL FIXATION CLAMP
SYNTHES (USA)	393.464	ADJUSTABLE PIN CLAMP
SYNTHES (USA)	393.48	ANGLED EXTERNAL FIXATION CLAMP
SYNTHES (USA)	393.64	ROD-TO-PIN ADJUSTABLE CLAMP
SYNTHES (USA)	393.647	COMBINATION CLAMP
SYNTHES (USA)	393.71	UNIVERSAL JOINT FOR TWO TUBES
SYNTHES (USA)	393.722	3/4 FIXATION RING
SYNTHES (USA)	393.732	3/4 STEEL RING
SYNTHES (USA)	393.734	3/4 EXTERNAL FIXATION RING
SYNTHES (USA)	393.736	3/4 EXTERNAL FIXATION RING
SYNTHES (USA)	393.751	ROD-TO-PIN UNIVERSAL CLAMP
SYNTHES (USA)	393.753	ROD CLAMP
SYNTHES (USA)	393.756	ROD TO ROD CLAMP
SYNTHES (USA)	394.8	CARBON FIBER ROD
SYNTHES (USA)	394.80	CARBON FIBER ROD

MANUFACTURER	MODEL NUMBER	DESCRIPTION
SYNTHES (USA)	394.82	CARBON FIBER ROD
SYNTHES (USA)	394.83	CARBON FIBER ROD
SYNTHES (USA)	394.84	CARBON FIBER ROD
SYNTHES (USA)	394.85	CARBON FIBER ROD
SYNTHES (USA)	394.86	CARBON FIBER ROD
SYNTHES (USA)	394.87	CARBON FIBER ROD
SYNTHES (USA)	395.55	OPEN CLAMP
SYNTHES (USA)	395.56	PIN TO ROD COUPLER
SYNTHES (USA)	395.57	ROD TO ROD COUPLER
SYNTHES (USA)	395.597	ROD TO PIN COUPLER
SYNTHES (USA)	395.6	CARBON FIBER ROD
SYNTHES (USA)	395.62	CARBON FIBER ROD
SYNTHES (USA)	395.63	CARBON FIBER ROD
SYNTHES (USA)	395.64	CARBON FIBER ROD
SYNTHES (USA)	395.65	CARBON FIBER ROD
SYNTHES (USA)	395.66	CARBON FIBER ROD
SYNTHES (USA)	395.72	CONNECTING BARS (S.S.)
SYNTHES (USA)	395.73	CONNECTING BARS (S.S.)
SYNTHES (USA)	395.73C	CONTRA ROD
SYNTHES (USA)	395.74	CONNECTING BARS (S.S.)
SYNTHES (USA)	395.75	CONNECTING BARS (S.S)
SYNTHES (USA)	395.76	CONNECTING BARS (S.S)
SYNTHES (USA)	395.77	CONNECTING BARS (S.S.)
SYNTHES (USA)	395.782	CARBON FIBER ROD
SYNTHES (USA)	395.784	CARBON FIBER ROD
SYNTHES (USA)	459.014	EXTERNAL FIXATION DEVICE
SYNTHES (USA)	633-200	STEEL ROD
SYNTHES (USA)	B18-200	STEEL ROD
SYNTHES (USA)	B18-300	STEEL ROD
SYNTHES (USA)	B18-350	STEEL ROD
SYNTHES (USA)	B18-400	STEEL ROD

Predicate device(s):	K000682	Synthes Large Fragment DCL System
	K010344	Synthes (USA) Adjustable Large Fixator
		System
	K914558	Synthes TraumaFix [™] External Fixator
	K961350	Synthes (U.S.A.) Mini External Fixator
	K962484	Synthes Titanium External Fixator Clamps
	K973017	Synthes Combination Clamp and
		Dynamization Clip
	K963618	Synthes Simple Small External Fixator

Device description:

External fixation devices are specially designed frames, clamps, rods, rod-to-rod couplings, pins, posts, fasteners, wire fixations, fixation bolts, washers, nuts, hinges, sockets, connecting bars and screws used

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for the management of bone fractures and reconstructive, as well as corrective, orthopedic surgery. Materials used include metal alloys, plastic and composites. These materials are chosen to address a wide range of fractures and applications as well as to allow for the appropriate amount of rigidity and stability.

Intended use:

External Fixation Devices are intended to be used for the fixation of supracondylar, or condylar fractures of the femur; for fusion of a joint; for surgical procedures that involve cutting the bone, for fixation of bone fractures; bone reconstruction; as a guide pin for insertion of other implants; or may be implanted through the skin so that a pulling force or traction may be applied to the skeletal system.

Indications statement:

Reprocessed external fixation devices are indicated for use in patients requiring external skeletal fixation oand treatment of fractures, osteotomy, arthrodesis, correction of deformities, fracture revision, bone reconstruction procedures, limb lengthening, correction of bony or soft tissue deformities and segmental bony or soft tissue defects.

Technological characteristics:

The design, materials, and intended use of the Reprocessed External Fixation Device s are identical to the predicate devices. The mechanism of action of the Reprocessed External Fixation Device is identical to the predicate devices in that the same standard mechanical design, materials, shapes and sizes are utilized. There are no changes to the claims, intended use, clinical applications, patient population, performance specifications, or method of operation.

Performance data:

Bench and laboratory testing was conducted to demonstrate performance (safety and effectiveness) of the Reprocessed External Fixation Device s.

- Biocompatibility
- Validation of reprocessing

Performance testing demonstrates that Reprocessed External Fixation Devices perform as originally intended.

Conclusion:

In accordance with the Federal Food, Drug and Cosmetic Act 21 CFR Part 807 and based on the information provided in this premarket notification, Alliance Medical Corporation concludes that the modified device (the Reprocessed External Fixation Device) is safe, effective and substantially equivalent to the predicate devices as described herein.



Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

JUN 2 4 2002

Mr. Don Selvey Vice President Regulatory Affairs and Quality Assurance Alliance Medical Corporation 10232 South 51st Street Phoenix, Arizona 85044

Re: (K012623) K012634, K012645, K012648

Trade Name: Reprocessed External Fixation Devices

Regulation Number: 21 CFR 888.3030

Regulation Name: Single/multiple component metallic bone fixation appliances and

accessories

Regulatory Class: II

Product Code: KTT, KTW, JEC

Dated: April 3, 2002 Received: April 4, 2002

Dear Mr. Selvey:

We have reviewed your Section 510(k) premarket notifications of intent to market the devices referenced above and have determined the devices are substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the devices, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your devices are classified (see above) into either class II (Special Controls) or class III (PMA), they may be subject to such additional controls. Existing major regulations affecting your devices can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your devices in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your devices comply with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your devices as described in your Section 510(k) premarket notifications. The FDA finding of substantial equivalence of your devices to a legally marketed predicate device results in a classification for your devices and thus, permits your devices to proceed to the market.

If you desire specific advice for your devices on our labeling regulation (21 CFR Part 801 and additionally 21 CFR Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4659. Additionally, for questions on the promotion and advertising of your devices, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html

Sincerely yours,

Celia M. Witten, Ph.D., M.D.

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Director

Division of General, Restorative and Neurological Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

Indications for Use Statement

510(k) Number (if known): KOI 2623

Device Name: Alliance Medical Corporation Reprocessed External Fixation Devices

Indications for Use: Reprocessed external fixation devices are indicated for use in patients requiring external skeletal fixation and treatment of fractures, osteotomy, arthrodesis, correction of deformities, fracture revision, bone reconstruction procedures, limb lengthening, correction of bony or soft tissue deformities and segmental bony or soft tissue defects.

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SYNTHES (USA)	394.87	CARBON FIBER ROD
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Division Sign-Off)

Division of General, Restorative and Neurological Devices

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395.56	PIN TO ROD COUPLER
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395.597	ROD TO PIN COUPLER
395.6	CARBON FIBER ROD
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Concurrence of CDRH, Office of Device Evaluation (ODE)

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Division of General, Restorative

and Neurological Devices

510(k) Number

Prescription Use (per 21 CFR 801.109) or

Over-the-Counter Use ___